

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DAVON WASHINGTON, et. al.,

Plaintiffs,

v.

Civil Action 1:18-cv-12306
(CM)

The City of New York, et. al.,

Defendants.

I, JOHN W. LIGUORI, declare under the penalty of perjury pursuant to 28 U.S.C. 1746, that the following is true and correct:

1. I am a Senior Assistant County Attorney and of counsel to Daniel C. Lynch, Esq., Albany County Attorney, Albany County Department of Law, counsel for the Albany County Defendants in this action and an attorney duly admitted to practice in the Southern District of New York. I make this Declaration in opposition to Plaintiff's motion for a preliminary injunction.
2. Annexed hereto are true and accurate copies of the following Exhibits submitted on behalf of the Albany County Defendants:

Exhibit A – Consists of copies of ACCF Incident Reports, Use of Force Reports, Health Facility Notes and Inmate Disciplinary Reports pertaining to Plaintiff's entry to the ACCF on February 13, 2018.

Exhibit B – Consists of copies of Albany Medical Center records pertaining to Plaintiff dated February 14, 2018.

Exhibit C – Consists of a copy of a photograph depicting contraband recovered from plaintiff marked as an Exhibit at Plaintiff's General Municipal Law § 50-h hearing dated November 21, 2018.

Exhibit D – Consists of a copy of the transcript of the Plaintiff's General Municipal Law § 50-h hearing held on November 21, 2018.

Exhibit E – Consists of copies of the ACCF Inmate Disciplinary Review Form for the plaintiff's disciplinary hearing dated February 26, 2018.

Exhibit F – Consists of copies of ACCF Incident Reports, Use of Force Reports, Log Book notes and Interdisciplinary Progress Notes, and Inmate Commitment Summary dated July 4, 2018.

Exhibit G – Consists of a copy of ACCF General Order #183-CF-98 revised as of May 13, 2013.

Exhibit H – Consists of a copy of the U.S. Department of Homeland Security Albany County Jail Review dated November 22, 2018.

Exhibit I – Consists of a copy of the New York State Commission of Correction Minimum Standard Jail Evaluation recommending favorable accreditation, dated August 1, 2018.

Exhibit J – Consists of a copy of Accreditation Report of the National Commission on Correctional Health Care, dated June 28, 2013.

Exhibit K – Consists of a copy of a handwritten letter received by ACCF Superintendent Michael J. Lyons signed by Plaintiff, Steven Espinal, dated August 14, 2018.

Dated: February 11, 2019
Albany, New York

OFFICE OF THE ALBANY COUNTY ATTORNEY

/s/

John W. Liguori
Senior Assistant County Atty.
SDNY Bar Roll #: JL1217